

UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF NEW YORK

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In re:

CORNELIUS STEPHENS

Case No. 1-20-40911

Chapter: 13

Debtor(s)  
-----X

APPLICATION IN SUPPORT OF  
ORDER TO SHOW CAUSE

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U.S. BANKRUPTCY COURT  
EASTERN DISTRICT OF  
NEW YORK

To the Hon. Carla E. Craig, Bankruptcy Judge;

I Cornelius Stephens, Movant herein, make this application in support  
of my Order to Show Cause to seek entry of an Order to:

Relieve Debtor of the requirement that he comply with 11 USC secs.362(b)(22) and 362(j), and any  
rents or arrears paid thereunder be applied as payment under Chapter 13 plan.

In support of the relief requested, I hereby allege as follows:

First, Debtor should be granted relief on the grounds eviction proceeding resulting in judgement of  
possession were stayed and dismissed by Order of the Superior Court of New Jersey, Salem County,  
dated February 14, 2020.

Second, Judgment of Possession was obtained in breach of a Stipulation Agreement entered into  
between Debtor and CastleRock 2017 LLC. The language of the Stipulation Agreement indicates that  
where Debtor is in default of the said agreement, the "...Landlord, with notice to the tenant, may file  
certification..." to obtain a warrant of removal. No such notice was given. Moreover, notice is mandated  
under N.J. Court Rule 6:6-6(d).

WHEREFORE, Movant prays for the entry of an Order to Show Cause granting the relief  
requested.

Dated: March 7, 2020

By: 

(Signature of movant)

Type or Print Name: Cornelius Stephens

Address: 33 Main Street

Pennsville, NJ 08070

Telephone Number: (856)275-4731

CS Bankruptcy 2020 @ JMail.Cm

RETURN DATE: \_\_\_\_\_

**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF NEW YORK**

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In re:

Case No. 1-20-40911

CORNELIUS STEPHENS

Chapter: 13

**Debtor(s)**

-----X

**ORDER TO SHOW CAUSE**

Upon the annexed application of Movant, Cornelius Stephens seeking entry of an Order to \_\_\_\_\_

\_\_\_\_\_, it is

**ORDERED** that CastleRock 2017 LLC show cause at \_\_\_\_\_ o'clock on the date of \_\_\_\_\_ or as soon thereafter as Movant may be heard before the Honorable **Carla E. Craig** Bankruptcy Judge in Courtroom 3529 at United States Bankruptcy Court located at 271 Cadman Pl., East. Brooklyn, New York 11201, why this Court should not enter an Order to \_\_\_\_\_.

**ORDERED** that service of this Order to Show Cause together with the application be served on or before the end of the business day on \_\_\_\_\_, upon

\_\_\_\_\_, and upon the Trustee at \_\_\_\_\_ and United States Trustee.

**ORDERED** that objections, if any, to the relief requested shall be made in writing, shall set forth with particularity, the grounds for such objection and shall be filed with the Clerk of the Court along with an extra copy marked "Chambers Copy," Trustee, United States Trustee, and the Movant on or before \_\_\_\_\_; and it is further

**ORDERED** that the hearing scheduled herein may be adjourned by the Court, from time to time, without further notice other than announcement of the adjourned hearing date in open court.

Dated: Brooklyn, New York  
March 7, 2020

\_\_\_\_\_  
United States Bankruptcy Judge